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6 Attorney for Michael Terrell Beale

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,
10 Plaintiff,
11 v.
12 MICHAEL TERRELL BEALE,
13 Defendant.

Case No. 2:17-cr-00050-JAD-CWH-1

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Second Request)

15 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
16 United States Attorney, and Justin J. Washburne, Assistant United States Attorney, counsel for
17 the United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn
18 N. Witt, Assistant Federal Public Defender, counsel for Michael Terrell Beale, that the
19 Revocation Hearing currently scheduled on January 17, 2024 at 11:00 a.m., be vacated and
20 continued to a date and time convenient to the Court, but no sooner than thirty (30) days.

21 This Stipulation is entered into for the following reasons:

- 22 1. Defense counsel has requested discovery from the United States Probation
23 Office and production of the same is pending.
24 2. Additional time is necessary to allow defense counsel to review discovery
25 upon receipt, discuss the same with Mr. Beale, and fully advise him on this case.
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1 3. Defense counsel needs additional time to conduct necessary investigation as to
2 the allegations in the Petition and prepare for the revocation hearing, if necessary.

3 4. Mr. Beale is in custody and agrees with the need to continue the hearing.

4 5. The parties agree to the continuance.

5 This is the second request for a continuance of the revocation hearing.

6 DATED this 12th day of January, 2024.

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8 RENE L. VALLADARES
9 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

10 By: Jacquelyn N. Witt
11 JACQUELYN N. WITT
12 Assistant Federal Public Defender

By: Justin J. Washburne
 JUSTIN J. WASHBURNE
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MICHAEL TERRELL BEALE,

7 Defendant.
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Case No. 2:17-cr-00050-JAD-CWH-1

ORDER

10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled
11 for January 17, 2024 at 11:00 a.m., be vacated and continued to February 26, 2024 at the hour
12 of 2:00 p.m.

13 DATED this 16th day of January, 2024.

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16 UNITED STATES DISTRICT JUDGE
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